

HHS IMPLEMENTATION OF PLGHA

HHS awarding agencies administer grants in accordance with HHS' Uniform Administrative Requirements, Cost Principles, and Audit Requirements found at 45 CFR Part 75.

- PLGHA applicability under HHS Awards:
 - Foreign non-governmental organizations (NGOs) receiving HHS global health assistance either directly from HHS as a recipient, from a non-governmental pass-through entity, or as a subrecipient of a domestic or other foreign NGO. Global health assistance to national or local governments, public international organizations, and other similar multilateral entities is not subject to this policy.
- PLGHA compliance for new and existing HHS Awards:
 - Standard PLGHA language will be published in all new global health assistance Notice of Funding Opportunities (NOFOs)
 - Notices of Awards (NoAs) may either include the entire PLGHA Standard Provision, or include a statement in the NoA with a description of the PLGHA and its direct applicability to the funding award, and include a link to the Standard Provision.

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- The PLGHA policy Standard Provision will have to be inserted into all new awards, including non-competing continuation, competitive renewal, and supplemental awards issued after May 15, 2017.
- Recipients and subrecipients signify their acceptance of all terms and conditions of the NoA the moment they first drawdown funds.
- Should a recipient or subrecipient not accept the terms and conditions of the PLGHA policy, their award will be terminated in accordance with the processes outlined in 45 CFR 75.371–.375.

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HHS Points of Contact

- OGAPAs Division of Grants
 - Jeffrey D. Johnson, Associate Deputy Assistant Secretary, Division of Grants
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 - Quadira Dantro, Director, Office of Grants Policy, Oversight, and Evaluation
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 - Anthony Petruccelli, Senior Policy Analyst, Office of Grants Policy, Oversight, and Evaluation
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CDC and Partner Compliance with PLGHA

- For new awards, PLGHA language will be published in every Notice of Funding Opportunity.
- For current awards, PLGHA language will be inserted into the Notice of Grant Award (NGA) for all applicable recipients.
- The first drawdown of funds signifies the recipients acceptance of all terms and conditions of the NGA.
- Should a recipient not accept the terms and conditions of the new policy, their award will be terminated.
- Project Officers and Activity Managers should review family planning statutory requirements and the PLGHA policy with partners after each NGA has been received.

CDC Points of Contact

- Please reach out to your headquarter points of contact if you have questions.
 - Technical Implementation
 - **Amy Medley** igm8@cdc.gov
 - Budget
 - **Valerie Naglich** eo5@cdc.gov
 - Management
 - **Sharmeen Premjee** vsx8@cdc.gov

Health Resources and Services Administration (HRSA)

- **Overarching Principle:**
 - Working in partnership with the US inter-Agency teams to ensure that all Foreign Assistance appropriated funds managed by HRSA are compliant with PLGHA
- **Actions to date:**
 - Reviewed all HRSA international programs to identify those that may be potentially impacted by the policy – PEPFAR funded programs identified as a potential
 - Audited existing PEPFAR programs to assess vulnerability
 - Constituted a HRSA-wide Steering Committee to coordinate PLGHA issues

Health Resources and Services Administration (HRSA)

- **Immediate Next Steps:**
 - Develop a comprehensive compliance plan for HRSA
 - Include PLGHA language in all new PEPFAR funded Cooperative Agreements and amendments to existing agreements that receive new funds
 - Adapt training materials provided by USAID and HHS to HRSA's program needs
 - Train HRSA staff and PEPFAR implementing partners managed by HRSA
 - Develop a compliance monitoring plan with scheduled timelines for reports
- **Future**
 - Institute plans for managing violations and remedial actions